

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



July 19, 1995

ALL-COUNTY LETTER NO. 95-31

TO: ALL COUNTY WELFARE DIRECTORS
ALL COUNTY CHIEF PROBATION OFFICERS
ALL COUNTY MENTAL HEALTH DIRECTORS
ALL COUNTY FISCAL OFFICERS
ALL COUNTY AUDITOR CONTROLLERS

REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order or Settlement Agreement
- ☐ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

SUBJECT: Emergency Assistance (EA) Program - Temporary Policy Change in the Authorization of EA Applications

REFERENCE: All County Letters (ACL) 94-89 and 94-90

The purpose of this letter is to communicate a temporary change in policy with regard to the authorization of all Emergency Assistance (EA) applications cleared through the Assistance to Children in Emergency (ACE) tracking system for the period beginning September 19, 1994 and continuing through September 18, 1995.

Counties must implement this new authorization policy immediately. While this letter provides an explanation of the new authorization process, the specific tools and accompanying instructions necessary to accommodate this change were sent directly to each county's ACE coordinator in April.

EA PROGRAM BACKGROUND

EA is a federally funded program under Title IV-A of the Social Security Act. Under provisions of the Act, Federal Financial Participation (FFP) is available to provide assistance and/or services to families for the purpose of alleviating emergency situations that meet certain specified criteria. The EA emergency definitions and eligibility criteria are contained in California's Title IV-A State Plan. One of the more critical requirements is that EA only be authorized once during any period of twelve consecutive months.

Currently the EA program consists of a Probation component and a Child Welfare Services (CWS) component. The Probation component was implemented July 1, 1993 and provides assistance and/or services to children whose behavior has resulted in their removal from the home and in a judicial determination that the child must remain in out-of-home care for more than seventy-two (72) hours. It includes juvenile assessment centers (juvenile halls), residential treatment facilities (camps and ranches), foster care for wards, and after care. The CWS component was implemented September 1, 1993 and provides assistance and/or services for children determined to be at risk due to abuse, neglect, abandonment, or exploitation. The CWS component includes emergency shelter care and foster care for dependents and voluntary placements. Effective August 1, 1994, the CWS component was expanded to also include emergency response activities and crisis resolution services.

EA POLICY BACKGROUND

Family-Based Eligibility

When the EA program was first implemented, it was designed around a family-based eligibility policy. Under family-based eligibility, the "eligible needy child's" family members were authorized to receive EA through inclusion in the child's case plan. The "eligible needy child" for whom the EA application was taken was designated as the "primary service child" (PSC). The EA eligibility for all of the PSC's family members who were included in the EA case plan was consumed regardless of whether EA assistance and/or services were received during the twelve-month period of eligibility. Further, family members shared the same not-to-exceed (NTE) date as the PSC and thus, were not eligible for EA again until the expiration of the NTE date.

In order to meet the federal requirement that an applicant be authorized to receive EA only once during any twelve-month period, a statewide tracking system was implemented. This tracking system, known as the List of Emergency Assistance Participants System (LEAPS), was designed, implemented and maintained by the County of Los Angeles. All authorized family members were to be entered into the LEAPS which was designed to track families through the PSC's head-of-household (HOH). County eligibility workers accessed the LEAPS to determine whether an applicant's eligibility had been consumed during the prior twelve-month period.

Child-Specific Eligibility

On September 19, 1994, the California Department of Social Services (CDSS) implemented a child-specific eligibility policy that superseded the family-based eligibility policy. Under the child-specific eligibility policy, each "eligible needy child" is considered a "family". Therefore, there is no need for the designation of a PSC. Each child who is experiencing his/her own emergency can apply for EA and, if found eligible, be authorized for his/her own twelve-month period of eligibility.

To coincide with the new child-specific eligibility policy, the CDSS designed and implemented the ACE tracking system to replace the LEAPS. Whereas the LEAPS tracked applicants for EA through the PSC's HOH, the new ACE tracking system was designed to track each child authorized to receive EA. The ACE system searches existing data and matches the name and social security number of each "applicant child" against the children already residing in the ACE database to ensure that they have not been authorized for EA during the prior twelve-month period. These changes in policy and the tracking system methodology were transmitted through issuance of All County Letters (ACL) 94-89 and 94-90.

PROBLEM STATEMENT

Prior to the implementation of ACE, all LEAPS records were converted to the ACE system. However, after the implementation of ACE, it was discovered that not all siblings of a PSC who were authorized to receive EA under the family-based eligibility policy were entered into the LEAPS. Consequently, not all siblings authorized to receive EA are in the ACE database; thereby impacting the integrity of the ACE searching process.

The following change in the EA authorization process will allow counties to authorize applications with full knowledge of the applicant's eligibility status. As stated at the beginning of this letter, this is a temporary change. Once the ACE system has been operational for a period of twelve months, the NTE dates of all authorizations under the family-based eligibility policy will have expired. At that point, the ACE system will only be searching child-specific eligibility authorizations.

NEW AUTHORIZATION PROCESS

Each "eligible needy child" is linked to a HOH. The HOH link is a constant between the LEAPS and the ACE system that will allow for the identification of siblings who were included in a PSC's case plan but who were not entered into the LEAPS.

At this time, the ACE system is not able to search the names of HOHs. The CDSS is currently pursuing enhancements to the ACE system to include an automated HOH search. However, these enhancements will not be available until later this year. In the meantime, the CDSS has developed a manual HOH search.

In January, the CDSS requested the California Department of Health Services (CDHS) to produce a printout of all HOHs, and their spouses, who were entered into the LEAPS prior to the conversion to the ACE system. This printout, hereafter referred to as the LEAPS FILE REPORT, contains identifying information on approximately 50,000 HOHs and their spouses that will allow counties to conduct a manual HOH search. County ACE coordinators were notified of this policy change and sent instructions on how to use the LEAPS FILE REPORT in April.

For applications cleared through the ACE system prior to the receipt of this letter, as well as for all future applications received during the effective period of this policy, counties are required to perform a HOH search. However, the method used to accomplish the HOH search is a county option. Counties may choose from one of the following options:

1. Immediately begin to utilize the LEAPS FILE REPORT to perform a manual HOH search;
2. Wait until the ACE enhancement is completed, and instructions issued, allowing for an automated HOH search;
3. Utilize the manual search until the automated search is available.

If the manual search option is selected, the LEAPS FILE REPORT must be used to accomplish the manual HOH search. Regardless of what search process is utilized, if a match is found, the county will be required to review the PSC's case file for the previous episode to determine the "applicant child's" EA eligibility. If the "applicant child" was authorized to receive EA assistance and/or services by inclusion in another family member's case plan, (regardless of whether any EA assistance and/or services were actually received), the child's EA eligibility has been consumed for the twelve-month period of eligibility of the original case. The child shares the same NTE date as the PSC and thus, is not eligible for EA again until the expiration of the NTE date.

Until a county implements a method for conducting a HOH search, all applications processed by the county must be authorized on a presumptive eligibility basis. To protect the funding of assistance and/or services authorized for the period of September 19, 1994 through September 18, 1995, counties must also implement a method for documenting the results of the HOH search process for each "applicant child."

The CDSS understands the labor intensive effort required to implement this temporary policy; however, it is the only means by which counties can authorize EA applications with full knowledge of the "applicant child's" EA eligibility status. This policy was presented to various county representatives and their input was taken into consideration prior to implementation.

Your cooperation and understanding of this matter is most appreciated. If you have any questions or comments, please contact Nancy Stone, Manager of the EA Policy Unit, at (916) 322-5946.


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